

## LAW OFFICE OF ALI NAJMI

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## **VIA ECF**

March 13, 2020

Hon. Kenneth M. Karas United States District Court Judge Southern District of New York 300 Quarropas Street White Plains, NY 10601

RE: USA v. Crossland 19 Cr. 645 (KMK)

Dear Judge Karas:

This letter is to request the Court to allow myself and my client, Stephen Parente, to appear by telephone before the Court on March 17, 2020.

Yesterday I was alerted that a member of my staff is likely infected with the Corona Virus and showing symptoms. She is also a part time graduate student at the John Jay College of Criminal Justice and had contact with a classmate who is s a confirmed infected case. Although I am not showing any symptoms, I have been advised by medical professionals to self-quarantine for 14 days. As such, I am unable to appear before the Court on March 17, 2020.

Given my inability to appear before the Court, and the fact that the next appearance will largely deal with routine discovery matters, I would like to request that my client's physical appearance be excused and appearance by telephone be allowed. Furthermore, my client lives in the state of Georgia and requiring him to appear on this date without counsel would pose a hardship. My client waives his right to be physically present at this appearance.

Sincerely

ALI NAIML ESO.

Granted. Coursel please contact coursel to the arrange to be on the conference so ordered.

KENNETH M. KARAS U.S.D.J.

3/13/20